

EXHIBIT

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

10-cv-6005 (RWS)

Plaintiff,

-against-

CITY OF NEW YORK, et al

Defendants.

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**DECLARATION OF JEFFREY SCHLANGER PURSUANT TO
28 U.S.C. § 1746 UNDER THE PENALTY OF PERJURY**

1. As an attorney who is admitted to practice law in this State and before this Court, I am submitting this declaration in support of the plaintiff's application for attorney's fees in the above-referenced action.

2. I attended SUNY Binghamton as an undergraduate student graduating with honors as a Political Science major. I went on to law school at New York University School of Law graduating with a JD in 1978. I joined the Manhattan District Attorney's Office as an Assistant District Attorney in 1978 and worked there until 1990 ultimately serving as both a Senior Trial Counsel and Senior Investigative Counsel in the Office's Rackets Bureau where I prosecuted a number of high profile organized crime cases. Upon leaving the DA's Office, I founded a private investigation firm that, in 1998, was sold to

Kroll, Inc. I spent the next 11 years at Kroll, serving as President of the Security Services Group and then Kroll Government Services, which I founded. During that period of time, among other things, I served as the Deputy Independent Monitor of the Los Angeles Police Department, where I managed the day-to-day operations of the monitorship. During this time, I also founded a business line conducting security clearance investigations for various US government entities including the US Office of Personnel Management (OPM), US Customs and Border Protection (CBP), and US Immigration and Customs Enforcement (ICE). In 2009, Kroll Government Services was spun out of Kroll and renamed KeyPoint Government Solutions, where I served as the president and CEO for the next five years. In 2014, I rejoined the Manhattan District Attorney's Office as the Chief of Staff, where I was in charge of day-to-day operations of the Office for District Attorney Cyrus Vance. I remained in that position for approximately 14 months, when I left to accept my current position, as the President of Exiger Advisory, at Exiger LLC, where our major assignment is the monitorship of HSBC pursuant to a deferred prosecution agreement.

3. I am personally acquainted with John Lenoir as an attorney.

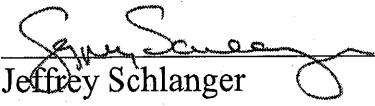
We were colleagues in the Manhattan District Attorney's office for a period; and since 2007, I have worked closely with Mr. Lenoir in projects involving police compliance and misconduct, including the federal monitorship of LAPD and investigation of police-involved shootings for the City of Austin, Texas.

4. I am also familiar with Mr. Lenoir's work in investigating civil rights issues in government employment practice and the workplace environment. He was certified as a civil rights investigator by the U.S. Department of Justice, and he led KeyPoints's engagements to conduct internal investigations of civil rights allegations arising from the Department of Homeland Security Federal Law Enforcement Training Centers and the U.S. Treasury Department's U.S. Mint police force.

5. Mr. Lenoir is an accomplished trial lawyer and highly experienced in civil rights matters involving law enforcement. In my opinion, given my knowledge of the normal rates charged for such legal services, Mr. Lenoir's request for fees at the rate of \$575 an hour would be a fair and reasonable rate in the City of New York for an individual with his level of knowledge and experience in the area of police compliance and civil rights.

6. I declare that the foregoing is true and correct.

Dated: November 17, 2015


Jeffrey Schlanger